

Exhibit 32

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ARNOLD ROTH, et al.)
)
)
 v.) Civil Action No.: 1:11-cv-01377 (RCL)
)
)
ISLAMIC REPUBLIC OF IRAN, et al.)
)
)
)

DECLARATION OF PESIA ROTH

I, PESIA ROTH, declare under penalty of perjury under the laws of the United States of America, state upon personal knowledge that:

1. I am an adult of sound mind, over twenty-one (21) years of age and make this statement under penalty of perjury based on my own personal knowledge.

2. I am the natural born sister of Malka Roth. Malka died on August 9, 2001 in Jerusalem, Israel after a suicide bomber detonated a bomb in the Sbarro restaurant.

3. I was born on [REDACTED], 1992 in Jerusalem, Israel. I was nearly 7 years younger than Malka.

4. I am a citizen of the United States and Israel. A copy of my United States passport is attached as Exhibit A.

5. I live in Jerusalem, Israel.

6. Since the murder of my sister, Malka, I have found it very difficult to discuss the emotional impact and effect her death has had on me and the only way for me to express my feelings and how Malka's death has effected my life is in writing.

7. Growing up, Malka and I were very close. We would sing and play music together, have deep and meaningful conversations (despite our age gap she would talk to me at eye level), play cards, go swimming. She was an incredible big sister, very loving and caring. She would spoil me with presents and treats and often take me for outings. She was very precious to me.

8. The hardest part about Malka's death for me is not having her around in my day to day life. Not knowing what she would achieve in her life, what kind of grown up she would be. Not being able to share with her the joys and difficult times of life. Having a gaping hole in our family.

9. Malka was a gifted musician who played the classical flute and guitar.

10. I can imagine that had Malka lived to adulthood, performance would be a big part of her life.

11. One of my favorite memories of Malka was walking together to the community swimming pool on a snow day when all the roads were blocked. We had a great time there, the pool was heated like a sauna. On our way back, we stopped at the local shop and got some of our favorite treats and ate them on our way home. We came home frozen and soaking wet, but really happy.

12. On August 9, 2001, Malka and her best friend, Michael Raziel, stopped for lunch at the Sbarro pizza shop in the center of Jerusalem on their way to a youth group activity. Malka and Michal were both killed there, along with over a dozen others, as a direct and proximate result of the bombing at Sbarro.

13. The incident was a major event, widely reported in the news media within minutes, and the subject of much attention in the neighborhood and in our family. Immediately after the explosion at Sbarro was reported, several members of our family began the process of locating each other member of the family by phone. Within an hour, it was evident that Malka could not be located. All the members of the family remained in close contact throughout the afternoon and evening and night, mostly from within the family home. I was there too. It was very difficult to wait the hours to find out what had happened to Malka. I remember crying and many of my siblings and parents being very emotionally distraught as well.

14. Around 2:00 am on Friday morning, August 10, 2001, my siblings Shaya and Pinchas who had traveled to the government pathology center at Abu Kabir to see if they could get any information regarding my sister phoned home. They had identified Malka's body and they notified my father on the phone that our very worst fears had materialized and that she was dead. She had died in the bombing. It was terrible to know this, to see the awful impact on my mother, to go through the process of trying to understand how such a cruel thing could have been done to her and to our family.

15. I have experienced emotional trauma and physical pain as a result of the shock of Malka's murder and the loss of her company and companionship. In the few years immediately after her murder and while I was still in elementary school and middle school, I experienced very difficult times as a result of the trauma and its effect on me. I received counseling then and subsequently from licensed psychologists.

16. My life will never be the same without my sister Malka. I miss talking with her, sharing stories with her, having her be a part of my life as I grew from being a young girl to someone finding her way in the world.

17. My family and I are very private people. We do not generally speak publicly or allow the media into our lives. We are doing this now to decrease the possibility of it happening again, so other people and families do not have to experience the same tragic sudden loss our family has suffered.

I, Pesia Roth, declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.

Executed on this the 30 day of September 2014.


Pesia Roth

Exhibit A



Exhibit 33

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ARNOLD ROTH, et al.)
)
)
 v.) Civil Action No.: 1:11-cv-01377 (RCL)
)
ISLAMIC REPUBLIC OF IRAN, et al.)
)
)
)

DECLARATION OF RIVKA ROTH RAPPAPORT

I, RIVKA ROTH RAPPAPORT, under penalty of perjury under the laws of the United States of America, declare upon personal knowledge that:

1. I am an adult of sound mind, over twenty-one (21) years of age and make this statement under penalty of perjury based on my own personal knowledge.
2. I am the natural born sister of Malka Roth. Malka died on August 9, 2001 in Jerusalem, Israel after a suicide bomber detonated a bomb in the Sbarro restaurant.
3. I was born on [REDACTED] 1989 in Jerusalem, Israel. I was 3 ½ years younger than Malka.
4. I am a citizen of the United States and Israel. A copy of my United States passport is attached as Exhibit A.
5. I live in Jerusalem, Israel.
6. Since the murder of my sister, Malka, I have found it very difficult to discuss the emotional impact and effect her death has had on me and the only way for me to express my feelings and how Malka's death has effected my life is in writing.
7. Growing up, Malka and I were very close, we shared a bedroom, went to the same school and youth group, and did lots of other things together, just like sisters do.

8. The hardest part about Malka's death for me is that my husband and daughter never got to meet her, and that I never got to see her get married and have kids.

9. Malka was a gifted musician who played the classical flute and guitar.

10. I can imagine that had Malka lived to adulthood, performance would be a big part of her life.

11. One of my favorite memories of Malka is of her playing on the guitar and singing, and of her taking care of my younger sister Haya.

12. Prior to her death she was very busy with volunteer work and I didn't see much of her, but a couple of nights during the week she was murdered we went out together to town. One night we went together with my older brother, Pinchas, to eat in the Sbarro pizza and pasta store, and another night it was all the family going to out for ice cream. During that outing, I got insulted from something and left the ice cream store, and Malki came out after me, soothed me and calmed me down and convinced me to come back into the ice cream parlor. That's one of my last memories of her.

13. On August 9, 2001, Malka and her best friend, Michael Raziel, stopped for lunch at Sbarro restaurant for pizza on their way to youth group activity. Malka and Michal both died there, along with over a dozen others, as a direct and proximate result of the bombing at Sbarro.

14. The incident was a major event, widely reported in the news media within minutes, and the subject of much attention in the neighborhood and in our family. Immediately after the explosion at Sbarro was reported, several members of our family began the process of locating each other member of the family by phone. Within an hour, it was evident that Malka could not be located. All the members of the family remained

in close contact throughout the afternoon and evening and night, mostly from within the family home. I was there too. It was very difficult to wait the hours to find out what had happened to Malka. I remember crying and many of my siblings and parents being very emotionally distraught as well. I remember that one of the worst moments was finding out that Michal's death had been determined. Michal was a close friend of the family, and knowing she was killed made it very hard to believe we would find out Malki was unharmed. We still didn't find her the whole evening and night. I stayed close to my siblings and friends who came over to support, trying to stay upbeat. I remember being very optimistic every time we were told by someone that they think they found Malki - either a first-aid provider who said he thought he saw her unharmed and the bombing zone, or getting a call from our neighbor-doctor who said there's an unidentified girl going in to the operating room. Obviously, all those were false alarms. The uncertainty was excruciating and at some point I fell asleep.

15. Around midnight on Friday morning, August 10, 2001, my siblings Shaya and Pinchas traveled to the government pathology center at Abu Kabir to see if they could get any information regarding my sister. Shortly thereafter they phoned home to say they had identified Malka's body and that she was dead, a victim of the bombing. At that point I woke up from my mother's wailing and moaning in the other room, and that's how I knew Malki had been found dead.

16. I have experienced emotional trauma and physical pain as a result of the shock of Malka's murder and the loss of her company and companionship. Following

Malka's death I had difficulty getting back to school, especially because I had just started a new high school, the one in which Malki had been a student, and I felt like Malki's presence was everywhere. I was known as "Malki's sister" and it was hard for me to just fit in like a normal student and concentrate on my studies. I went to a psychologist once or twice, but didn't continue on a regular basis, which is something I regret today. As a teenager I was turned off by the idea of going to psychological therapy.

17. My life will never be the same without my sister Malka. I miss talking with her, sharing stories with her, having her meet my children. I wish I could have seen her study and build her own career, start her own family and meet her husband and children.

18. My family and I are very private people. We never spoke publicly or allowed the media into our lives. We are doing this to decrease the possibility of it happening again, so other people and families do not have to experience the same tragic sudden loss our family has suffered.

I, Rivka Roth Rappaport, declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.

Executed on this the 4th day of September 2014.

R. Rappaport
Rivka Roth Rappaport

Exhibit A



Exhibit 34

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ARNOLD ROTH, et al.)
v.) Civil Action No.: 1:11-cv-01377
(RCL))
ISLAMIC REPUBLIC OF IRAN, et al.)

DECLARATION OF ZVI ROTH

I, ZVI ROTH, under penalty of perjury under the laws of the United States of America, declare upon personal knowledge that:

1. I am an adult of sound mind, over twenty-one (21) years of age and make this statement under penalty of perjury based on my own personal knowledge.

2. I am the natural born brother of Malka Roth. Malka died on August 9, 2001 in Jerusalem, Israel after a suicide bomber detonated a bomb in the Sbarro restaurant.

3. I was born on [REDACTED], 1983 in Australia. I was 2 ½ years older than Malka.

4. I am a citizen of the United States and Israel. A copy of my United States passport is attached as Exhibit A.

5. I live in Jerusalem, Israel with my wife Yifat Roth.

6. Since the murder of my sister, Malka, I have found it very difficult to discuss the emotional impact and affect her death has had on me and one of the main ways for me to express my feelings and how Malka's death has affected my life is in writing.

7. Growing up, Malka and I were very close. We would play together often, go to the swimming pool together, and generally spend lots of time together.

8. The hardest part about Malka's death for me is how my memory of her fades as time passes by. The person who was once the closest to me in the world has become a jumble of memory fragments. The only things she left me are the sweet memories of her and of us, but eventually those will be gone too.

9. Malka was a gifted musician who played the classical flute and guitar.

10. I can imagine that had Malka lived to adulthood, performance would be a big part of her life.

11. Prior to her death, Malka was deeply troubled by the terrorist attacks that claimed many lives before hers. The frequent attacks left her distraught and at times unable to concentrate or even attend school.

12. On August 9, 2001, Malka and her best friend, Michael Raziel, stopped for lunch at Sbarro restaurant for pizza on their way to youth group activity. Malka and Michal both died there, along with over a dozen others, as a direct and proximate result of the bombing at Sbarro.

13. The incident was a major event, widely reported in the news media within minutes, and the subject of much attention in the neighborhood and in our family. Immediately after the explosion at Sbarro was reported, several members of our family began the process of locating each other member of the family by phone. Within an hour, it was evident that Malka could not be located. All the members of the family remained in close contact throughout the afternoon and evening and night, mostly from within the family home. I was there too. It was very difficult to wait the hours to find out what had happened to Malka. I remember crying and many of my siblings and parents being very emotionally distraught as well. My brother's friend

came over and talked with me. He told me that I didn't understand what was happening, and I argued that I did. Only later did I realize that he was completely right, that the worst scenario I had imagined, that my sister had been injured, was far from the horrifying truth.

14. Around 2:00am on Friday morning, August 10, 2001, my siblings Shaya and Pinchas traveled to the government pathology center at Abu Kabir to see if they could get any information regarding my sister. Shortly thereafter they phoned home to say they had identified Malka's body and that she was dead, a victim of the bombing. It was terrible. When I heard the news I suddenly felt terribly exhausted. I felt that everything in my life was collapsing, and I hoped that I would wake up to just another day, to my ordinary life, and that everything would be as usual. That didn't happen, and the nightmare continued until this very day.

15. I have experienced emotional trauma and physical pain as a result of the shock of Malka's murder and the loss of her company and companionship. Following Malka's death I had difficulty studying and socializing. I felt that nobody had any idea what I had experienced and what I was going through. I received grief counseling from both a psychologist and from a social worker.

16. My life will never be the same without my sister Malka. I miss talking with her, sharing stories with her, having her meet my wife.

17. My family and I are very private people. We never spoke publicly or allowed the media into our lives. We are doing this to decrease the possibility of it happening again, so other people and families do not have to experience the same tragic sudden loss our family has suffered.

I, Zvi Roth, declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.

Executed on this the 4th day of September 2014.

Zvi Roth



Exhibit A



Exhibit 35

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DECLARATION OF SHAYA ROTH

I, SHAYA ROTH, declare under penalty of perjury under the laws of the United States of America, state upon personal knowledge that:

1. I am an adult of sound mind, over twenty-one (21) years of age and make this statement under penalty of perjury based on my own personal knowledge.
2. I am the natural born brother of Malka Roth. Malka died on August 9, 2001 in Jerusalem, Israel after a suicide bomber detonated a bomb in the Sbarro restaurant.
3. I was born on [REDACTED] 1981 in Australia. I was 4 ½ years older than Malka.
4. I am a citizen of the United States and Israel. A copy of my United States passport is attached as Exhibit A.
5. I live in Jerusalem, Israel.
6. Since the murder of my sister, Malka, I have found it very difficult to discuss the emotional impact and effect her death has had on me. With great difficulty, I have worked through some of my feelings and thoughts regarding her murder with 2 therapists. These sessions helped me understand that I have yet to come to terms with my loss and with the drastic changes it caused me, my family, my relationships my parents and siblings, and my ability to deal with emotional stress.

7. As young children, Malka and I were very close. She was my first sister and I felt responsible for her. As teenagers, we grew more apart, each one of us busy with his or her social circle. It was clear to me Malka still looked up to me as an older brother and inevitably we would have had a close relationship as adults had she lived longer.

8. The hardest part about Malka's death for me is the impact it has had on the family unit. It has taken a heavy toll on my parents, particularly my mother, and severely limited the ability of the family to function healthily as a supportive and constructive force in my life.

9. Malka was a gifted musician who played the classical flute and guitar.

10. I can imagine that had Malka lived to adulthood, performance would be a big part of her life.

11. One of my favorite memories of Malka was a hike I took with her and my younger brother Zvi in a valley near our home, in the summer of 2001, shortly before her death. We didn't often spend time together outside of the house, and it was a refreshing and enjoyable afternoon. After Malka's death I read in her diary how much she cherished the day and how much it meant to her.

12. A couple of nights before her death, the whole family went out to have ice cream in honor of my enlistment to the army. At one point, Malka ran out and came back with a shopping bag full of snacks for me to take with me. I was moved by the gesture and thanked her and gave her a hug. This was the last time I spoke to her. After her death I kept the bag of snacks with me for a few months, unable to either eat them nor throw them away.

13. On August 9, 2001, Malka and her best friend, Michael Raziel, stopped for lunch at Sbarro restaurant for pizza on their way to youth group activity. Malka and Michal both died there, along with over a dozen others, as a direct and proximate result of the bombing at Sbarro.

14. The incident was a major event, widely reported in the news media within minutes, and the subject of much attention in the neighborhood and in our family. Immediately after the explosion at Sbarro was reported, several members of our family began the process of locating each other member of the family by phone. Within an hour, it was evident that Malka could not be located. All the members of the family remained in close contact throughout the afternoon and evening and night, mostly from within the family home. I was there too. I escorted my mother to the local hospital to search for Malka, with the tension and fear rising as time went by and we found nothing. On the way we (we were driving together with Aviva Raziel, mother of Michal who was also missing and was killed together with Malka) received a call from a friend of Malka who said they had arranged to meet at Sbarro that afternoon. I remember my mother's hysterical reaction and her attempt to exit the driving car on hearing this. Throughout the afternoon I stayed with my mother.

15. Around 2:00 am on Friday morning, August 10, 2001, my older brother Pinchas and I traveled to the government pathology center at Abu Kabir, after being told there was a body that may match Malka's description. I will never forget my wandering thoughts on the long drive to Abu Kabir; my deliberation while looking at her body lying on the clinic's bed, knowing it was her but hesitating to declare it and making it official and all the while having a glimmer of doubt or hope that I may be making a mistake and that Malka is alive somewhere; the call home to say I had found her body - talking to my father and hearing my mother crying in the background; and then the long drive home in silence.

16. I have experienced emotional trauma and physical pain as a result of the shock of Malka's murder and the loss of her company and companionship. I was a newly drafted soldier when Malka was killed. After the seven days of Shiva, I returned to basic training and did not spend much time dealing with my feelings. I can remember the weekends at home on leave as very difficult emotionally, anything but a relief from harsh army conditions.

17. My life will never be the same without my sister Malka. I miss talking with her, sharing stories with her, having her meet my children. Now that I am a father, I think often about how she would have played a central and crucial role in my family life as an aunt to my daughter and sister in law to my wife.

18. My family and I are very private people. We never spoke publicly or allowed the media into our lives. We are doing this to decrease the possibility of it happening again, so other people and families do not have to experience the same tragic sudden loss our family has suffered.

I, Shaya Roth, declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.

Executed on this the 4th day of September 2014.



Shaya Roth

Exhibit A



Exhibit 36

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ARNOLD ROTH, et al.)
v.) Civil Action No.: 1:11-cv-01377 (RCL)
ISLAMIC REPUBLIC OF IRAN, et al.)

)

DECLARATION OF PINCHAS ROTH

I, PINCHAS ROTH, declare under penalty of perjury under the laws of the United States of America, state upon personal knowledge that:

1. I am an adult of sound mind, over twenty-one (21) years of age and make this statement under penalty of perjury based on my own personal knowledge.
2. I am the natural born brother of Malka Roth. Malka died on August 9, 2001 in Jerusalem, Israel after a suicide bomber detonated a bomb in the Sbarro restaurant.
3. I was born on [REDACTED] 1978 in Australia. I was 7 ½ years older than Malka.
4. I am a citizen of the United States and Israel. A copy of my United States passport is attached as Exhibit A.
5. I live in Jerusalem, Israel with my wife Jennie Rosenfeld and our children.
6. Since the murder of my sister, Malka, I have found it very difficult to discuss the emotional impact and effect her death has had on me and the only way for me to express my feelings and how Malka's death has affected my life is in writing.

7. On August 9, 2001, Malka and her best friend, Michael Raziel, stopped for lunch at Sbarro restaurant for pizza on their way to youth group activity. Malka and Michal both died there, along with over a dozen others, as a direct and proximate result of the bombing at Sbarro.

8. The incident was a major event, widely reported in the news media within minutes, and the subject of much attention in the neighborhood and in our family. Immediately after the explosion at Sbarro was reported, several members of our family began the process of locating each other member of the family by phone. I visited the information center at the Bikur Holim hospital, located a few yards from the scene of the bombing, but they had no information about Malka. As the day turned to night, I travelled home and joined the rest of my family in frantically trying to find some information about where she might be.

9. Around 2:00am on Friday morning, August 10, 2009, my brother Shaya and I traveled to the government pathology center at Abu Kabir to see if they could get any information regarding my sister. Shortly thereafter we phoned home to notify my parents that we had identified Malka's body and that she was dead, a victim of the bombing.

10. I have experienced emotional trauma and physical pain as a result of the shock of Malka's murder and the loss of her company and companionship. Following Malka's death I had trouble moving around in public places among strangers, for fear that one of them might be carrying a bomb. I participated in individual and group therapy for several years.

11. My life will never be the same without my sister Malka. I miss talking with her, sharing stories with her, having her meet my children.

12. My family and I are very private people. We never spoke publicly or allowed the media into our lives. We are doing this to decrease the possibility of it happening again, so other people and families do not have to experience the same tragic sudden loss our family has suffered.

I, Pinchas Roth, declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.

Executed on this the 11th day of September 2014.



Pinchas Roth

Exhibit A

